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Attorneys for Second Third-Party Defendant
John Kim a/k/a Jang H. Kim

PEI LICENSING, INC.

Plaintiff

- against -

DI-MED INTERNATIONAL INC.; ANGIE'S
SHOES AND LEATHER GOODS, INC.; JOHN
DOES 1-10; JANE DOES 1-10; AND XYZ
COMPANIES 1-10,

Defendants

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF
NEW YORK
CIVIL ACTION NO. 11-0153
(JBW) (RML)

ANGIE'S SHOES AND LEATHER GOODS,
INC.

Third Party Plaintiff

- against -

GEOFFREY ALLEN CORPORATION,

Third-Party Defendant

**SECOND THIRD-PARTY
DEFENDANT, JOHN KIM a/k/a
JANG H. KIM'S ANSWER TO
FIRST AMENDED ANSWER TO
THIRD PARTY COMPLAINT,
SEPARATE DEFENSES,
COUNTERCLAIM AND SECOND
THIRD-PARTY COMPLAINT OF
THIRD-PARTY DEFENDANT/
SECOND THIRD-PARTY PLAINTIFF
GEOFFREY ALLEN CORPORATION**

GEOFFREY ALLEN CORPORATION,

Second Third-Party Plaintiff,

- against -

JOHN KIM a/k/a JANG H. KIM

Second Third-Party Defendant.

Second Third-Party Defendant, JOHN KIM a/k/a JANG H. KIM ("KIM") by his attorney,

M. JOSEPH LEVIN P.C. as and for his answer to the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff GEOFFREY ALLEN CORPORATION herein alleges as follows:

1. Denies knowledge and information sufficient to form a belief contained in Paragraphs 5, 6, 12, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 28 and 29 of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

2. Denies each and every allegation contained in Paragraphs 25 and 26 of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

3. Denies each and every allegation contained in Paragraphs 2, 3, 4, 5, 6, 7, 8, 9, 10 and 11 of COUNT ONE of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

4. Denies each and every allegation contained in Paragraphs 16, 17 and 18 of COUNT FOUR of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

5. Denies each and every allegation contained in Paragraphs 20, 21 and 22 of COUNT FIVE of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

6. Denies each and every allegation contained in Paragraphs 23, 24 and 25 of COUNT SIX of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

7. Denies knowledge and information sufficient to form a belief contained in Paragraphs 27, 28, 30, 31 and 32 of COUNT SEVEN of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

8. Denies each and every allegation contained in Paragraphs 29 of COUNT EIGHT of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff.

WHEREFORE, Second Third-Party Defendant , JOHN KIM a/k/a JANG H. KIM demands judgment dismissing COUNT ONE - EIGHT of the Third-Party Complaint, Separate Defenses, Counterclaim and Second Third-Party Complaint of Third-Party Defendant/Second Third-party Plaintiff together with interest costs and disbursement of this action.

CERTIFICATION

I hereby certify that Second Third-Party Defendant, JOHN KIM a/k/a JANG H. KIM is not currently aware of any pending or contemplated action or arbitration involving the subject matter of this action.

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By 

M. Joseph Levin
ID# 4833

Dated: September 12, 2013